"Perina, Tom/SBO"
<Tom.Perina@CH2M.com>
07/12/2004 12:07 PM

To "Antipas, Artemis/SEA" <Artemis.Antipas@CH2M.com>, David Taylor/R9/USEPA/US@EPA
cc Christopher Lichens/R9/USEPA/US@EPA
bcc
Subject RE: Validation Support and Options

Dave,

Artemis' responses to your comments are below (in color). Let's discuss this tomorrow, July 13, at 09:30. Please call 866-331-0889, code 249513.
Regards,

Tom

-----Original Message-----
From: Antipas, Artemis/SEA
Sent: July 07, 2004 3:57 PM
To: Perina, Tom/SBO
Subject: FW: Validation Support and Options
Importance: High

Tom, I have entered explanation below for each of David's paragraph's in color , Artemis

-----Original Message-----
From: Taylor.David@epamail.epa.gov [mailto:Taylor.David@epamail.epa.gov]
Sent: Thursday, June 17, 2004 3:46 PM
To: Antipas, Artemis/SEA
Cc: Perina, Tom/SBO; Lichens.Christopher@epamail.epa.gov; Fong.Rose@epamail.epa.gov; Brickner.Carl@epamail.epa.gov; Fong.Vance@epamail.epa.gov; Plate.Mathew@epamail.epa.gov
Subject: Validation Support and Options

Hi Artemis,

The QA Office needs a more concrete description of exactly what you require in terms of validation services for Omega, as well as other sites. Although I understand conceptually what you are requesting, we would like it made specific. This would be a list of the information you would like examined and flagged, as needed. Your lists should cover all anticipated analyses Hill might want on this site, and preferable, any other sites.
For organic GC/MS analyses we need the following summary quality control data looked at and flagged for the individual sample data points per project criteria (acceptance limits) and EPA validation functional guidelines:
-tuning data
-initial calibration (to include response factors and RSD or coefficient data)
-continuing calibration (again for response factors and deviation data)
-internal standard data
-LCS data
-surrogate data

-blank data (lab and field) , concentrations adjusted per x5/x10 rule
-matrix spike and duplicate data
-overall checks per lab sequence logs for sufficient level of effort and proper correlation for the flagging

For inorganic ICP/AA analyses we need the following checked and flagged for individual sample results:
-initial calibration
-continuing calibration
-blanks
-LCS data
-matrix spike and duplicate data
-interference checks
-dilution checks
--overall checks per lab sequence logs for sufficient level of effort and proper correlation for the flagging

The above are for the most widely requested methods for other methods it would need to be described on a method specific basis or the above description may be sufficient to explain for other methods what 'all QC summary data would be. All data need to be checked only perQC summary data for the above. Raw data checks can be limited to 10% of the data (i.e. Tier 3)'

With respect to CLP, it is also not clear whether you have looked closely at the CADRE reports, as I am advised that these should provide flags for pretty much all of the areas you requested. My understanding is also that the scope of what CADRE checks and flags will be expanding in the near term and again next year, so if not covered already, these expansions might ensure you get what you need in the future. CADRE is automatically performed on all CLP data packages, but not on any Region 9 Laboratory data. If the current CADRE review does not cover everything you require, please identify what additional review/flagging you feel is necessary.
In the past the proposed Tier 1 CADRE reviews do not include all QC data but are limited to accuracy and precision checks, the flagging (such as blank corrections) for the individual samples is not provided.

We need this information so that we can talk to our contractors to find out what he feasibility and costs might be, so we can advise Superfund or manage our ESAT resources, depending on who is identified as performing the validation. The QA Office no longer performs validation itself.

It is not clear to me to what extent these requests are being driven by CH2M Hill and to what extent they are being driven by site needs defined by the EPA RPM. Strictly speaking, it is the RPM who should be requesting the validation services, although I recognize that Hill prepares the RSCC form the QAPP/FSP documents in which these requests are made. It might be good if we could clarify that issue as well.
These requests initially are described in the QAPP. and reviewed by the QAO. In the QAPP we describe the basis for the above level of effort in terms of end data use. For example for groundwater monitoring efforts where trends at trace levels need to be established the above level of flagging is needed for comprehensive use of data.

Opinions differ within the QA Office whether the level of effort will be very comparable to a full fledged validation or more along the line of a Tier 1A forms review. We are also not sure that the summary forms typically provided by the Region 9 laboratory in its data packages would contain all the information required to flag the data as you have suggested. If they do not, we would need to persuade the laboratory that changing their data package format was worth the

effort. Otherwise, a validator would have to look into the raw data part of the package to extract the information and we will have started down the road to a Tier 3 review. This also leaves open the question of data deliverables from Corps of Engineers laboratories. These are dictated by Superfund and are not within the control of the QA Office or the Regional Laboratory. Although there are no analyses in this category at Omega that I am aware of, I have been to
For the data package requirements in the QAPP we generally request all QC summary forms, for future plans we'll ensure greater clarity.

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